

PSJ2 Exh 108

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan
Aaron Polster

The County of Cuyahoga v. Purdue
Pharma, L.P., et al.
Case No. 17-OP-45005
City of Cleveland, Ohio vs. Purdue
Pharma, L.P., et al.
Case No. 18-OP-45132
The County of Summit, Ohio,
et al. v. Purdue Pharma, L.P.,
et al.
Case No. 18-OP-45090

Videotaped Deposition of Hugh Shannon

Cleveland, Ohio

January 24, 2019

9:02 a.m.

Reported by: Bonnie L. Russo
Job No. 3196191

1 people that the drug cartels have
2 responsibility for people who ingest the drugs
3 that they send into the country and ultimately
4 die?

5 A. Any? That's a broad category. I
6 can't speak for all people. I can speak for
7 what I know.

8 Q. Okay. What do you know?

9 A. So the -- yes, there are -- people
10 who sell illicit drugs, who manufacture illicit
11 drugs and ship illicit drugs into this country
12 bear some responsibility, not all.

13 The market was not created by them.
14 They were created by massive distributions in
15 dispensing of prescription opioids.

16 Q. Yeah. And I -- I'm going to get to
17 that. But I want to just -- let's just take it
18 one chain at a time.

19 So the cartels, they clearly have
20 some responsibility, right, by creating
21 these -- these illegal drugs that are shipped
22 into the country that are used unlawfully.

23 MR. GALLUCCI: Object --

24 BY MR. CHEFFO:

25 Q. Agree?